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10 Attorneys for Plaintiff Park Central Plaza 32, LLC

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15 **UNITED STATES BANKRUPCTY COURT**
16 **FOR THE DISTRICT OF NEVADA**

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18 In re:

19 PARK CENTRAL PLAZA 32, LLC;

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28 Debtors.

CASE NO. BK-S-11-14153-BTB

Chapter 11

PLAINTIFF'S STATEMENT UPON
AMENDED NOTICE OF
REMOVAL PURSUANT TO FED.
R. BANKR. P. 9027(e)(3)

PARK CENTRAL PLAZA 32, LLC;

Plaintiff,

v.

GREENBERG TRAURIG, LLP; and BOB
L. OLSON;

Defendants.

ADVERSARY PROCEEDING NO.
14-01096

In accordance with Federal Rule of Bankruptcy Procedure 9027(e)(3) and Local Rule 9027.1, Plaintiff Park Central Plaza 32, LLC, by its undersigned attorneys, hereby responds to the allegations in the Amended Notice of Removal, dated August 19, 2014, filed by Defendants Greenberg Traurig, LLP, and Bob L. Olson ("Defendants"), without consenting to removal, as

follows:

1. Plaintiff denies the allegation that the causes of action removed from the Nevada Eighth Judicial District Court Case No. A-14-701605-C styled *Park Central Plaza 32, LLC, v. Greenberg Traurig, LLP, et al.* (the “State Court Action”) are core proceedings. Plaintiff does not consent to entry of a final order or judgment by the United States Bankruptcy Court. All claims and causes of action asserted in the State Court Action are claims arising under Nevada state law. All claims are unrelated to Park Central Plaza 32, LLC’s bankruptcy case and will have no conceivable effect on any bankruptcy estate.

2. Plaintiff denies the factual allegations contained in the Notice of Removal, but such allegations are in any event irrelevant to a determination of whether the claims are core or non-core.

3. Plaintiff expressly reserves all of its rights and remedies with respect to the State Court Action, including but not limited to, the right (i) to trial by jury, (ii) to contest the jurisdiction of the United States District Court or the Bankruptcy Court with respect to the State Court Action or any aspect of it, (iii) to seek remand of the State Court Action to the Nevada Eighth Judicial District Court, Clark County, and/or (iv) to seek such other and further relief as may be appropriate. Plaintiff does not consent to the conduct of a jury trial by the Bankruptcy Court.

4. This statement is signed pursuant to Federal Rule of Bankruptcy Procedure 9011.

Respectfully submitted,

Dated this 27th day of August, 2014.

/s/ Robert A. Rabbat
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